

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143  
The Honorable Judge Ellis  
Hearing: Sept. 11, 2020

**MR. ZACKARY ELLIS SANDERS'S MOTION TO SUPPRESS BASED ON FALSE AND  
MISLEADING MATERIAL INFORMATION IN AFFIDAVIT PARAGRAPH 23 (Motion  
to Suppress No. 2)**

Zackary Ellis Sanders, by and through undersigned counsel, and pursuant to Federal Rule of Criminal Procedure 41 and the Fourth Amendment, respectfully moves this Court to suppress all evidence and illegal fruits obtained pursuant to the invalid search warrant issued based on false and misleading material information in Affidavit Paragraph 23. A memorandum in support is attached.

Respectfully submitted,

/s/ Jonathan Jeffress

Jonathan Jeffress (#42884)  
Emily Voshell (#92997)  
Jade Chong-Smith (admitted *pro hac vice*)  
KaiserDillon PLLC  
1099 Fourteenth St., N.W.; 8th Floor—West  
Washington, D.C. 20005  
Telephone: (202) 683-6150  
Facsimile: (202) 280-1034  
Email: [jjeffress@kaiserdillon.com](mailto:jjeffress@kaiserdillon.com)  
Email: [evoshell@kaiserdillon.com](mailto:evoshell@kaiserdillon.com)  
Email: [jchong-smith@kaiserdillon.com](mailto:jchong-smith@kaiserdillon.com)  
*Counsel for Defendant Zackary Ellis Sanders*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2<sup>nd</sup> day of September 2020, the foregoing was served electronically on the counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress

Jonathan Jeffress

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**[PROPOSED] ORDER**

This matter having come before the Court on Mr. Sanders's Motion to Suppress Based on False and Misleading Material Information in Affidavit Paragraph 23 (Motion to Suppress No. 2), and having reviewed the Government's Opposition thereto, it is, for good cause shown, **ORDERED** that the Motion to Suppress is **GRANTED**.

It is so ORDERED.

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THE HONORABLE T.S. ELLIS

Date: \_\_\_\_\_

Alexandria, Virginia